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Attorneys for PHILADELPHIA

INDEMNITY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
Pennsylvania corporation,

Plaintiff,

v.

IEC CORPORATION, a Delaware
corporation

Defendant.

IEC CORPORATION, a Delaware
corporation,

Counterclaimant,

v.

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
Pennsylvania corporation

Counter-Defendant

CASE NO. 8:16-CV-295-DOC (DFM)

**DECLARATION OF EDWARD J.
MCKINNON IN SUPPORT OF
PHILADELPHIA INDEMNITY
INSURANCE COMPANY'S
FURTHER RENEWED MOTION
FOR SUMMARY JUDGMENT OR,
IN THE ALTERNATIVE, PARTIAL
SUMMARY JUDGMENT**

Date: May 29, 2018

Time: 8:30 a.m.

Crtrm.: 9D

**REDACTED VERSION OF
DOCUMENT SUBMITTED UNDER
SEAL**

I, Edward J. McKinnon, hereby declare:

1 1. I have personal knowledge of the matters set forth herein. If called as a
2 witness, I could and would testify competently thereto under oath.

3 2. I was retained by plaintiff/counter-defendant Philadelphia Indemnity
4 Insurance Company ("PIIC") through its counsel to offer expert opinions in this
5 matter with IEC Corporation ("IEC") relating to insurance claims handling.

6 3. Attached hereto as **Exhibit 1** is a true and correct copy of my expert
7 report submitted on March 30, 2018 which outlines my opinions and is incorporated
8 by reference herein. This report includes but is not limited to my opinions: (

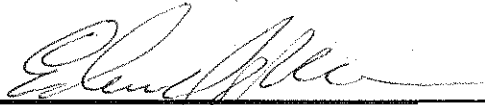
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25 [REDACTED] (See, e.g., Ex. 1 pp. 7-10, 12-
26 14, 16)

27 I declare under penalty of perjury under the laws of the United States of

America that the foregoing is true and correct.

Executed this 9th day of April, 2018 in Acton, California.



Edward J. McKinnon

California 94105 101 Second Street, 24th Floor CLYDE & CO US LLP

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Exhibit 1

EXHIBIT 1
HAS BEEN
CONDITIONALLY
FILED UNDER SEAL